

EDWARDS ANGELL PALMER & DODGE LLP
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BETH ISRAEL MEDICAL CENTER,

Plaintiff,

07 Civ. 6254 (MGC) (KNF)

- against -

1199/S.E.I.U. UNITED HEALTHCARE WORKERS
EAST, d/b/a LOCAL 1199/S.E.I.U. NATIONAL
HEALTH AND HUMAN SERVICE EMPLOYEES
UNION,


RULE 7.1 STATEMENT

Defendant.

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, to enable judges and magistrate judges of the Court to evaluate possible disqualification or recusal, the undersigned counsel of record for Beth Israel Medical Center, a private (non-governmental) party, certifies that the following are corporate parents, subsidiaries, or affiliates of that party which are publicly held: NONE.

Dated: August 2, 2007
New York, New York

EDWARDS ANGELL PALMER & DODGE LLP

By: 
Jason R. Bogni (JB-3597)
Attorneys for Beth Israel Medical Center
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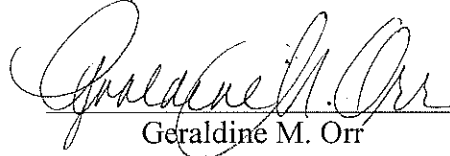
AFFIDAVIT OF SERVICE

Defendant.

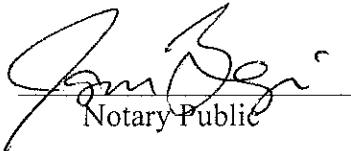
Geraldine M. Orr, being duly sworn, deposes and says that she is over the age of eighteen; is not a party to this action; and that on the 2nd day of August 2007, she served a true copy of the foregoing ANSWER TO COUNTERCLAIM and RULE 7.1 STATEMENT upon:

**1199/SEIU UNITED HEALTH CARE WORKERS EAST
301 WEST 43RD STREET
NEW YORK, NEW YORK 10036**

by depositing a true copy of said document enclosed in prepaid, sealed wrapper, properly addressed to the above-named party, in an official depository under the exclusive care and custody of the United States Postal Service, first class mail, within the State of New York.


Geraldine M. Orr

Sworn to before me this
2ND day of August 2007


Notary Public

**JASON BOGNI
Notary Public, State of New York
No. 02BO6164235
Qualified in Kings County
My Commission Expires: Apr. 18, 2011**